## BOOK 36 FACE 188

Smith, his wife, Louisa C. Gilbert and Caroline E. Gilbert, unto George H. Gilbert, dated May 15, 1871 and recorded in Liber C.M. 6, folio 304, one of the land records of Frederick County, Maryland, a copy of which said deed is attached hereto and prayed to be taken as a part hereof, marked Exhibit "D".

FIFTH: That said tract or parcel of land described in Exhibit "A" and which is the subject of these proceedings is a part of the same real estate described and conveyed in a deed from Martha Eyler, widow, Elsie Smith and

Smith, her husband, Helen Smith and

Smith, her husband, Bruce

Eyler and Ludie Eyler, his wife, Lola Eyler and

Eyler, her husband, Ruth Smith and

Smith, her husband, and Millie T. Gilbert, widow, unto Raymond Gilbert and Estie Gilbert, his wife, dated day of May,

1935 and recorded in Liber 399 folio 376, one of the land records of Frederick

County, Maryland, a copy of which said deed is attached hereto and prayed to be taken as a part hereof, marked Exhibit "E".

SIXTH: That your Complainants have been advised and therefore allege and aver that the aforesaid conveyance from Martha Eyler, et al, to Raymond Gilbert and Estie Gilbert, his wife, places a cloud on the title to that tract or parcel of land described in Exhibit "A" and which is the subject of these proceedings for the following reasons, to-wit:

- (a) The said conveyance to Raymond S. Gilbert and Estie Gilbert did not include all proper parties as grantors, to convey the total interest in the subject property of Simeon H. Gilbert;
- (b) That the said Raymond S. Gilbert, having acquired a partial interest in the subject property by deed aforesaid, did not convey the same to the grantees, Annie E. Dudrear and Lola A. Dorcus;
- (c) That the said Lola A. Dorcus, the surviving joint tenant had not acquired all the interest of the heirs of Simeon Gilbert.

SEVENTH: That your Complainants by themselves and their predecessors in interest have been in the actual, exclusive and adverse possession of the property described in Exhibit "A" which is the subject of these proceedings, prior to the filing of this Bill of Complaint, claiming to own the same in fee simple against the whole world and have paid all taxes of every kind levied or accessed against the property prior to the filing of this Bill of Complaint.

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